

Item 1 – Cover Page



Columbia Capital Management, LLC

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This Brochure provides information about the qualifications and investment advisory practices of Columbia Capital Management, LLC (“Columbia Capital”). If you have any questions about the contents of this Brochure, please contact us at 913-248-8500 or www.columbiacapital.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.

Columbia Capital is a registered investment adviser with the SEC. Registration does not imply a certain level of skill or training. Additional information about Columbia Capital also is available on the SEC’s website at www.adviserinfo.sec.gov. See **Material Changes on the following page.**

Item 2 – Material Changes

This Brochure dated March 21, 2022, represents the annual amendment to the initial Brochure for Columbia Capital Management, LLC.

Since the filing of the firm's last annual update Brochure on March 29, 2021, we have made various minor updates but no material changes were made to the Brochure.

Pursuant to SEC Rules, we will deliver to you a summary of any material changes to this and subsequent Brochures within 120 days of the close of our fiscal year. We may further provide other ongoing disclosure information about material changes as necessary. All such information will be provided to you free of charge.

Currently, our Brochure may be requested by contacting us at (913) 248-8500. Additional information about the firm is also available via the SEC's web site www.adviserinfo.sec.gov. The SEC's web site also provides information about any persons affiliated with the firm who are registered as investment adviser representatives of the firm.

Item 3 -Table of Contents

Item 1 – Cover Page	i
Item 2 – Material Changes	ii
Item 3 – Table of Contents.....	iii
Item 4 – Advisory Business	1
Item 5 – Fees and Compensation.....	2
Item 6 – Performance-Based Fees and Side-By-Side Management.....	2
Item 7 – Types of Clients	2
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	3
Item 9 – Disciplinary Information.....	4
Item 10 – Other Financial Industry Activities and Affiliations	4
Item 11 – Code of Ethics.....	4
Item 12 – Brokerage Practices	6
Item 13 – Review of Accounts	6
Item 14 – Client Referrals and Other Compensation	7
Item 15 – Custody.....	7
Item 16 – Investment Discretion	7
Item 17 – Voting Client Securities.....	8
Item 18 – Financial Information	8

Item 4 – Advisory Business

Introduction

Columbia Capital Management, LLC (“Columbia Capital”) was formed in 1996 and specializes in public finance municipal advisory services and investment advisory services primarily to local governments and not-for-profits.

As of the date of this statement, Jeff White, Managing Member, owns a 48% interest in Columbia Capital, Courtney C. Shea, Managing Member, owns a 24% interest, Stacey Walter, Chief Compliance Officer and Controller, owns an 8% interest, Curt de Crinis, Managing Director, owns an 8% interest, Khaleen Dwyer, Senior Vice President, owns a 5 % interest, David Abel, Managing Director, owns a 3% interest, Adam Pope, Senior Vice President, owns a 3% interest, and James Prichard, Senior Vice President, owns a 1% interest.

Investment Advisory Services

Columbia Capital’s current investment advisory services consist of active investment management for eleven local government entities, four not-for-profit clients and one liquidating trust. Columbia Capital engages in investment transactions only in investments permitted under its investment advisory clients’ investment policies and related state laws. Columbia Capital typically manages short-term portfolios of fund balances and bond-related proceeds and reserve funds of municipal governments and not-for-profit organizations. These securities are generally limited to insured or collateralized bank deposits, United States Treasury and federal agency securities, commercial paper, bankers’ acceptances, certain repurchase agreements and, in certain cases, general obligation and utility revenue bonds of municipal issuers.

Client Needs

Many of our clients are governmental entities subject to both statutory limitations on their permitted investments and restrictions contained in their investment policy. Other clients are not-for-profit borrowers and a liquidating trust, each with their own investment policies or similar restrictions. We manage each client’s assets in accordance with the statutory provisions applicable to them, when applicable, and in accord with their investment policy or other restrictions. In addition, bond proceeds investments are sometimes governed by the resolution or indenture authorizing each issue, which also may contain investment restrictions that are different from the operating funds of the same client. Liquidity needs of each client are taken into account in determining the amount of

funds that can be invested for longer periods of time and those funds that must remain liquid.

Client Assets

Columbia Capital's assets under management were \$1,035,446,086 as of December 31, 2021, distributed as follows:

	<u>Number of Client Accounts</u>	<u>Assets Under Management</u>
Discretionary	58	\$1,035,446,086
Non-Discretionary	0	None

Item 5 – Fees and Compensation

Fees for investment advisory services are calculated as a percentage of assets under management or on a fixed fee basis and are for providing management of an investment portfolio. The standard fee is .20% of the market value of the assets under management. The actual fee charged by Columbia Capital may be higher or lower depending on the type and size of portfolio managed. All fees are subject to negotiation with the client. These fees are payable in arrears on a monthly basis, or as otherwise negotiated. Fees for other investment advisory services not involving management of assets are determined by negotiation on a case-by-case basis.

Our clients will incur modest charges for custodial services, which are separately charged by the custodian. The custodian is not affiliated with Columbia Capital.

Item 6 – Performance-Based Fees and Side-By-Side Management

Columbia Capital has no performance fee arrangements.

Item 7 – Types of Clients

Columbia Capital provides investment advisory services to local government entities, to not-for-profit organizations and a liquidating trust created by certain states. Columbia Capital provides investment advisory services both for operating fund balances and for proceeds of bond issues, such as construction funds and reserve funds. We generally seek

to work with local government entities and not-for-profit organizations with investable balances of at least \$2,000,000, with the understanding that certain bond proceeds accounts will be expended over time and fall below that threshold.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Investment Strategy and Methods of Analysis Material Risks

Columbia Capital manages its clients' portfolios in a manner to meet their primary objectives in its investment activities, which are typically, in order of priority, safety, liquidity, and yield. Given these objectives, Columbia Capital invests its clients' funds in securities permitted by the client that meet the specific needs of the client on an account-by-account basis.

Because Columbia Capital typically manages short-term portfolios and bond-related proceeds and reserve funds of municipal governments and not-for-profits, we seek to purchase securities that mature at or before times expected to meet known liquidity needs of the client, and, to the extent available, longer dated securities for balances not expected to be needed to meet expenditure requirements, within the investment parameters applicable to the client and to the type of funds invested.

Material Risks

All investment programs have certain risks that are borne by the investor. Columbia Capital's investment approach seeks to minimize the risk of loss, however, investing in any securities involves risk of loss that clients should be prepared to bear. Investors face the following investment risks:

Default/Credit Risk: The probability that the issuer of a security will be unable or unwilling to fund the principal and interest payments due in accordance with the terms of the security.

Market Risk: Risk of market price loss, commonly referred to as market risk, results from investments in fixed-income securities followed by an increase in interest rates. The longer the remaining term to maturity of a fixed income security, the greater the potential loss for a given increase in interest rates. In the event market interest rates rise and a fixed-income security must be sold for any reason, the investor may sell the security for a lower price than the purchase price.

Interest Rate Risk: Interest rate risk is the risk of an investor holding an investment with a lower yield than the current market rate and incurs an opportunity cost for that investment by underperforming the market.

Liquidity Risk: Liquidity risk involves the ability to sell an investment before maturity to readily convert an investment into cash.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to the evaluation of Columbia Capital or the integrity of Columbia Capital's management. Columbia Capital has no information applicable to this Item.

Item 10 – Other Financial Industry Activities and Affiliations

Columbia Capital is also a registered municipal advisor with the SEC and Municipal Securities Rulemaking Board. As a municipal advisor, Columbia Capital provides advisory services in connection with the issuance of debt by state and local governments and not-for profit borrowers. For some clients, Columbia Capital serves as both its municipal advisor on bond offerings of the issuer and as the investment advisor of its operating funds and bond proceeds.

Columbia Capital has a wholly owned subsidiary, C.M. de Crinis & Co, Inc., which is based in California and provides opportunity zone consulting services. Additionally, Columbia Capital has a wholly owned subsidiary, CCM New Opportunities, LLC, which provides investment advisory services to Qualified Opportunity Funds.

Item 11 – Code of Ethics

Summary of Code of Ethics

Columbia Capital has adopted a Code of Ethics for all employees of the firm performing investment advisory services for Columbia Capital's investment advisory clients. Columbia Capital's Code of Ethics describes Columbia Capital's high standard of business conduct and its fiduciary duty to its investment and municipal advisory clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, restrictions on political campaign

contributions, and personal securities trading procedures, among other things. A copy of Columbia Capital's Code of Ethics is available to clients and prospective clients upon request.

Personal and Internal Transactions

Columbia Capital's investment advisory decisions are based on its clients' investment objectives. Aside from relatively short-term investments of idle working capital, Columbia Capital does not own any securities, nor does Columbia Capital expect to buy or sell any other types of securities for its own account in the future.

Columbia Capital engages in investment transactions only in investments permitted under its investment advisory clients' investment policies and related state laws. These securities are generally limited to insured or collateralized public deposits, United States Treasury and federal agency securities, commercial paper, bankers' acceptances, certain repurchase agreements and, in certain cases, general obligation and utility revenue bonds of municipal issuers. Due to the nature of the securities permitted for the client's account, the potential for a conflict of interest between the client and Columbia Capital's investment advisory personnel is minimal, other than certain purchases of municipal obligations. A potential conflict of interest exists between a municipal advisory client issuing bonds and an investment advisory client purchasing municipal bonds because the municipal advisory client seeks to offer its bonds at the lowest marketable yield while the investment advisory client seeks to maximize its yield for securities meeting its goals of safety and liquidity.

To prevent any potential conflict of interest between a municipal advisory client issuing bonds and an investment advisory client purchasing municipal bonds, Columbia Capital prohibits directing the purchase of any obligations of a municipal advisor client by an investment advisory client during the primary offering period of the municipal bonds. In addition, Columbia Capital prohibits the purchase of any callable municipal securities issued by its municipal advisory clients by its investment advisory clients. To ensure conformance with these prohibitions, Columbia Capital has enacted the following practices: (i) Columbia Capital maintains a list of all active municipal advisory clients of the firm, which must be reviewed regularly by any employee directing purchases of municipal securities for an investment advisory client, (ii) any employee seeking to direct the purchase of any securities of a municipal advisor client by an investment advisory client must consult with the Chief Compliance Officer, or her designee if she is unavailable, to assure the municipal security does not violate the prohibitions above, and (iii) the Chief Compliance Officer reviews all trades in municipal securities by Columbia Capital employees performing securities transactions for Columbia Capital's investment advisory clients at least quarterly.

Item 12 – Brokerage Practices

Columbia Capital undertakes the selection of brokers for individual transactions in accordance with general principles of best execution. Columbia Capital has a fiduciary and fundamental duty to seek best execution for client transactions and considers the full range and quality of a broker-dealer's services, including execution capability, commission rates, and the value of any research, financial responsibility and responsiveness, among other things. Some securities are purchased through a competitive bid process among qualified brokers. The broker providing the lowest cost or highest TIC, or best conforming bid overall for bids with multiple variables such as a range of maturity dates, depending on the nature of the bid terms, receives the award to deliver the securities. In other instances, brokers will offer Columbia Capital securities, usually municipal securities or federal agency securities, available for purchase through that broker. When acquiring municipal securities available for purchase Columbia Capital will consult market pricing data for that security using the secondary trading information available through EMMA, a service of the municipal securities rule-making board, as well as comparison to recent market transactions. For other securities, Columbia Capital will check pricing information on similar obligations and market data generally using Bloomberg and other price sources.

Columbia Capital may select brokerage firms that provide research, provided that such selection does not result in the payment of higher rates than those charged by other brokers, if we believe that the value of the research provided and the quality or nature of the brokerage services provided to the client are consistent with best execution. Columbia Capital does not receive "soft dollar" benefits from the client's brokers and counterparties. In the event Columbia Capital altered its practice regarding "soft dollar" benefits, such arrangements will fall within the safe harbor for fiduciaries' use of "soft dollar" payments established by Section 28(e) of the Securities Exchange Act of 1934, as amended.

Columbia Capital anticipates providing similar services to future clients with similar responsibilities and policies.

Item 13 – Review of Accounts

Columbia Capital's Chief Compliance Officer has the overall responsibility for conducting client account reviews. Columbia Capital's Chief Compliance Officer and Controller, Stacey Walter, will review securities transactions on behalf client accounts periodically. Columbia Capital will also review its clients' investment strategy annually or as requested by the client and revisions will be made, if needed, based on a client's changing circumstances. Columbia Capital may review its client's account more frequently as may be requested by the client's staff.

Columbia Capital provides its clients written monthly or quarterly reports unless a client requests otherwise. Columbia Capital also provides other or interim reports as may be requested by the client.

In addition, Columbia Capital prepares monthly or quarterly billing statements, or such other frequency as agreed upon, which are reviewed by Columbia Capital's Chief Compliance Officer and Controller.

Item 14 – Client Referrals and Other Compensation

Neither Columbia Capital nor any related person of Columbia Capital directly or indirectly compensates any person who is not a supervised person of Columbia Capital for client referrals.

Item 15 – Custody

Columbia Capital does not have custody over its client's funds or securities. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains the client's investment assets. Columbia Capital urges its clients to carefully review such statements and compare such official custodial records to the account statements that we may provide to the client. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16 – Investment Discretion

Columbia Capital typically receives discretionary authority from the client at the outset of an advisory relationship. The investment discretion exercised by Columbia Capital typically includes determining which securities are bought and sold for the accounts, the total amount of the securities to be bought and sold, the brokers with whom orders for the purchase or sale of securities are placed for execution, and the rates at which securities transactions are executed. At all times, discretion is to be exercised in a manner consistent with the client's investment policy. Columbia Capital continually observes the investment policies, limitations and restrictions of its client.

Item 17 – Voting Client Securities

Columbia Capital's clients' permissible investments typically do not include voting rights. Columbia Capital does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the firm's financial condition. Columbia Capital has no financial condition that impairs its ability to meet contractual and fiduciary commitments to clients. The owners of Columbia Capital are all active employees of Columbia Capital and the firm has no indebtedness.